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BROOKS, PIERCE, McLENDON, HUMPHREY & LEONARD, L.L.P.

ATTORNEYS AT LAW
RALEIGH, NORTH CAROLINA

MAILING ADDRESS
POST OFFICE BOX 1800
RALEIGH, N.C. 27602

OFFICE ADDRESS
SUITE 1600
FIRST UNION CAPITOL CENTER
150 FAYETTEVILLE STREET MALL
RALEIGH, N.C. 27601

TELEPHONE (919) 839-0300
FACSIMILE (919) 839-0304

HENRY E. FRYE
OF COUNSEL

J. LEE LLOYD
SPECIAL COUNSEL

FOUNDED 1897

AUBREY L. BROOKS (1872-1958)
W.H. HOLDERNESS (1904-1965)
L.P. McLENDON (1890-1968)
KENNETH M. BRIM (1898-1974)
C.T. LEONARD, JR. (1929-1983)
CLAUDE C. PIERCE (1913-1988)
THORNTON H. BROOKS (1912-1988)
G. NEIL DANIELS (1911-1997)

GREENSBORO OFFICE
2000 RENAISSANCE PLAZA
230 NORTH ELM STREET
GREENSBORO, N.C. 27401

WASHINGTON OFFICE
601 PENNSYLVANIA AVENUE, N.W.
SUITE 900, SOUTH BUILDING
WASHINGTON, D.C. 20004

WRITER'S DIRECT DIAL

(919) 834-9216

whargrove@brookspierce.com

L.P. McLENDON, JR.
HUBERT HUMPHREY
EDGAR B. FISHER, JR.
W. ERWIN FULLER, JR.
JAMES T. WILLIAMS, JR.
WADE H. HARGROVE
M. DANIEL MCGINN
MICHAEL D. MEEKER
WILLIAM G. MCNAIRY
EDWARD C. WINSLOW III
HOWARD L. WILLIAMS
GEORGE W. HOUSE
WILLIAM P.H. CARY
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ROBERT A. SINGER
JOHN H. SMALL
RANDALL A. UNDERWOOD
S. LEIGH RODENBOUGH IV
MARK J. PRAK
JILL R. WILSON
MARC D. BISHOP
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MACK SPERLING
JEFFREY E. OLEYNIK
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DAVID W. SAR
BRIAN J. McMILLAN
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STEPHEN G. HARTZELL-JORDAN
TIMOTHY W. JONES
JESSICA M. MARLIES
TERESA DELOATCH BRYANT
ELIZABETH TAYLOR MEHAFFEY
ANDREW J. HAILE

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May 10, 2002

MAY 10 2002

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W., TW-A325
Washington, D.C. 20554

**Re: Amendment of Section 202(b), Table of Allotments, FM Broadcast Stations
(Goldsboro and Smithfield, North Carolina)
MM Docket No. 02-40
RM-10377**

Dear Ms. Dortch:

Transmitted herewith, on behalf of New Age Communications, Inc., licensee of Radio Station WKIX(FM), Goldsboro, North Carolina, are an original and four copies of both (1) Motion for Leave to File Reply Comments and (2) Reply Comments in the above-captioned proceeding.

If any questions should arise during the course of your consideration of this matter, it is respectfully requested that you communicate with this office.

Sincerely,


Wade H. Hargrove
Counsel to New Age Communications, Inc.

Enclosures

cc: John A. Karousos
R. Barthen Gorman
James A. Koerner

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**Before the
Federal Communications Commission
Washington, D.C. 20554**

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MAY 10 2002

**FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY**

In the Matter of)	
)	
Amendment of Section 73.202(b))	MM Docket No. 02-40
Table of Allotments)	RM-10377
FM Broadcast Stations)	
(Goldsboro and Smithfield, North Carolina))	

Motion for Leave to File Reply Comments

New Age Communications, Inc. ("NAC"), licensee of Station WKIX(FM), Channel 272A, Goldsboro, North Carolina, by its counsel, hereby requests leave to file reply comments in the above-captioned proceeding.

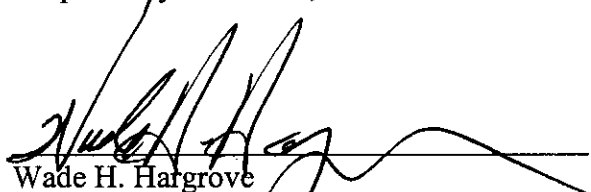
Pursuant to the Notice of Proposed Rule Making ("*Notice*"), DA 02-409 (released Feb. 22, 2002), the original reply comment deadline was April 30, 2002. On April 25, 2002, NAC filed a Request for Extension of Time ("*Request*") in which it sought an extension of the reply comment deadline, until May 10, 2002. The Commission has yet to act on the Request. The Request was based on the facts (1) that NAC did not timely receive a service copy of the comments and counterproposal filed by Franklin Broadcasting Co., licensee of WHLQ(FM), Louisburg, North Carolina ("WHLQ"), in accordance with the certificate of service attached thereto and that (2) WHLQ's comments were not available from the Commission itself until April 23, 2002. The circumstances surrounding NAC's inability to obtain a copy of WHLQ's comments are more fully set forth in the Request, which is incorporated herein by reference.

Good cause exists to accept these reply comments (1) for the reasons set forth in the Request; (2) since WHLQ's counsel has consented to NAC filing reply comments up to and including

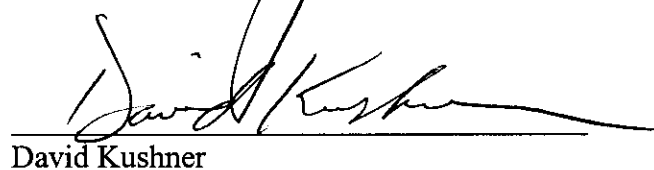
May 10, 2002; and (3) since WHLQ's counterproposal will otherwise be put on public notice, provided it is not defective, with its own comment and reply comment periods, thereby assuring that WHLQ, as well as the public at large, cannot be prejudiced by the filing of NAC's attached reply comments.

For the foregoing reasons, NAC requests leave to file the attached reply comments.

Respectfully submitted,



Wade H. Hargrove



David Kushner

BROOKS, PIERCE, McLENDON,
HUMPHREY & LEONARD, L.L.P.
First Union Capitol Center, Suite 1600
150 Fayetteville Street Mall (27601)
Post Office Box 1800
Raleigh, North Carolina 27602
Telephone: (919) 839-0300
Facsimile: (919) 839-0304

Counsel to New Age Communications, Inc.

May 10, 2002

**Before the
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Washington, D.C. 20554**

In the Matter of)	
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REPLY COMMENTS

Wade H. Hargrove
David Kushner

BROOKS, PIERCE, McLENDON,
HUMPHREY & LEONARD, L.L.P.
First Union Capitol Center, Suite 1600
150 Fayetteville Street Mall (27601)
Post Office Box 1800
Raleigh, North Carolina 27602
Telephone: (919) 839-0300
Facsimile: (919) 839-0304

Counsel to New Age Communications, Inc.

May 10, 2002

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Summary

New Age Communications, Inc. (“NAC”) has petitioned the Commission to reallocate Channel 272A from Goldsboro, North Carolina, to Smithfield, North Carolina, and to modify the license of WKIX(FM), which operates on Channel 272A, accordingly. Franklin Broadcasting Co., licensee of WHLQ(FM), Louisburg, North Carolina (“WHLQ”), has filed a counterproposal to reallocate Channel 273A from Louisburg to Rolesville, North Carolina, which would preclude NAC’s proposal to reallocate Channel 272A to Smithfield at the site specified.

WHLQ contends that its counterproposal should be granted and NAC’s Petition denied because WHLQ would provide first local transmission service to Rolesville which is a higher priority than NAC’s provision of first full-time FM transmission service to Smithfield. Under the Commission’s policies set forth in *Faye and Richard Tuck*, 3 FCC Rcd 5374 (1988) (“*Tuck*”), however, WHLQ is not entitled to an allotment preference for providing first local transmission service to Rolesville, especially since Rolesville is interdependent with the major metropolitan area of Raleigh.

The interdependency of the proposed community with the central city is the “critical consideration” in a *Tuck* analysis. The eight interdependency factors specified in *Tuck* plainly point to Rolesville’s interdependence with Raleigh: *First*, more than 93% of workers living in Rolesville commute to work outside of Rolesville, showing that local work patterns support a finding of interdependency. *Second*, Rolesville does not have its own daily or weekly newspaper or even local community shopper; newspaper coverage is provided by the Raleigh newspaper. In addition, although Rolesville does not have its own radio station, it is well served by the 10 radio stations whose protected service contours encompass Rolesville which are already licensed to communities

within the Raleigh Urbanized Area. *Third*, there is no evidence that the principal employees of the Town of Rolesville live there, supporting an inference that they perceive Rolesville as an integral part of the greater Raleigh area. *Fourth*, Rolesville does have its own local government—the only *Tuck* factor supporting independence—but, as noted, that government’s principal employees do not actually reside there. *Fifth*, Rolesville does not have its own telephone book or even its own listing in a local telephone book. *Sixth*, many of Rolesville’s commercial establishments are merely branches of establishments that serve the greater Raleigh area or are national franchises. Rolesville does not have its own hospital or transportation systems. *Seventh*, Rolesville is part of the greater Raleigh advertising market. *Eighth*, and finally, Rolesville does not have its own school system or public library. Rolesville’s water and sewer service are provided by the City of Raleigh. The town’s principal park is part of the Wake County park system. In sum, of the eight characteristics the Commission uses to assess interdependence, seven of them unequivocally point to Rolesville’s interdependence with Raleigh.

In addition, Rolesville is virtually adjacent to Raleigh and is only 1/300th Raleigh’s size. NAC is unaware of any case in which the Commission has found a specified community so close to and so disparate in size with the central city to be independent and ultimately to merit an allotment preference. And even Rolesville’s proposed signal population coverage helps to underscore that WHLQ’s counterproposal is nothing but a naked attempt to move closer to a burgeoning metropolis and increase the market value of the station. Therefore, a complete *Tuck* analysis demonstrates that WHLQ’s counterproposal is not entitled to a first local service allotment preference.

Consequently, in a comparative analysis, the public interest is better served by NAC’s proposal to bring a first full-time FM transmission service to Smithfield than it is by WHLQ’s

counterproposal to bring the 15th aural service licensed to the greater Raleigh area and, in doing so, deprive Louisburg of its only FM station. NAC would bring first FM transmission service and first nighttime transmission service to Smithfield, population 11,510, the county seat of the fastest growing county in North Carolina, while Goldsboro would still retain four aural services licensed to that community. By contrast, WHLQ proposes to serve Rolesville, population 907, which is so small that the Greater Raleigh Convention & Visitors Bureau uses just eight words to describe it: "This small town still boasts just one stoplight." Numerous cases support the finding that, in terms of both population and aural service, the allotment to Smithfield would serve the public interest significantly more than the proposed reallocation to Rolesville. Similarly, in comparing WHLQ's counterproposal for Rolesville with its current community of license, Louisburg, the equities clearly favor retention in Louisburg which has a population of 3111 compared with Rolesville's 907.

For the reasons set forth herein, WHLQ's counterproposal should not be accorded an allotment preference for allegedly providing first local transmission service to Rolesville. Instead, the Commission should engage in a comparative analysis of NAC's Petition and WHLQ's counterproposal and determine that the public interest is better served by NAC's proposal to bring second local transmission service and first full-time FM service to Smithfield than it is by WHLQ's counterproposal to bring the 15th aural service to the greater Raleigh area and deprive Louisburg of its only FM station. Therefore, NAC respectfully requests that the Commission grant its Petition.

* * *

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
Amendment of Section 73.202(b))	MM Docket No. 02-40
Table of Allotments)	RM-10377
FM Broadcast Stations)	
(Goldsboro and Smithfield, North Carolina))	

REPLY COMMENTS

New Age Communications, Inc. ("NAC"), licensee of Station WKIX(FM), Channel 272A, Goldsboro, North Carolina, by its counsel, hereby submits these reply comments in the above-captioned proceeding.

On August 3, 2001, NAC filed a Petition for Rule Making ("Petition") requesting that the Commission specify a new community of license for WKIX by amending the Table of FM Allotments, 47 C.F.R. § 73.202(b), by (i) deleting Channel 272A from Goldsboro, North Carolina, (ii) adding Channel 272A to Smithfield, North Carolina, and (iii) modifying the license for WKIX(FM), Goldsboro, North Carolina, to specify "Smithfield, North Carolina" as the Station's community of license.

On February 22, 2002, the Commission released a Notice of Proposed Rule Making ("Notice"), DA 02-409, seeking comment on NAC's Petition. NAC filed comments restating its intention, if the Commission allots Channel 272A to Smithfield, to promptly file an application for a construction permit to operate WKIX at Smithfield, North Carolina, and, upon grant, to promptly construct and operate the facilities.

Comments and a counterproposal were also filed by Franklin Broadcasting Co., licensee of

WHLQ(FM), Channel 273A, Louisburg, North Carolina (“WHLQ”). WHLQ counterproposed to amend the Table of FM Allotments by reallocating Channel 273A from Louisburg to Rolesville, North Carolina, and having its license modified accordingly.

NAC’s Petition and WHLQ’s counterproposal cannot both be granted at the sites specified. WHLQ contends that its counterproposal should be granted and NAC’s Petition denied because WHLQ would provide first local transmission service to Rolesville which is a higher priority than NAC’s provision of first full-time FM transmission service to Smithfield. As shown below, WHLQ is not entitled to an allotment preference for providing first local transmission service to Rolesville pursuant to the Commission’s policies set forth in *Faye and Richard Tuck*, 3 FCC Rcd 5374 (1988) (“*Tuck*”), and its progeny, especially since Rolesville is interdependent with the major metropolitan area of Raleigh. Consequently, in a comparative analysis, the public interest is better served by NAC’s proposal to bring first full-time FM transmission service to Smithfield than it is by WHLQ’s counterproposal to bring the 15th aural service licensed to the greater Raleigh area¹ and to deprive Louisburg of its one and only FM station.

I. WHLQ’s Counterproposal Is Not Entitled To An Allotment Preference

The Commission has long recognized that

it would be naive for us to ignore that granting a dispositive preference to an applicant proposing first local transmission service near a metropolitan center, without regard to the efficiency of the

¹ There are already 14 radio stations licensed to Raleigh or a community that is part of the 1990 Raleigh Urbanized Area: WDTF(AM), 570 kHz, Raleigh; WPTF(AM), 680 kHz, Raleigh; WRBZ(AM), 850 kHz, Raleigh; WPJL(AM), 1240 kHz, Raleigh; WCLY(AM), 1550 kHz, Raleigh; WKNC-FM, Channel 201A, Raleigh; WSHA(FM), Channel 205C3, Raleigh; WCPE(FM), Channel 209C, Raleigh; WQDR(FM), Channel 234C, Raleigh; WBBB(FM), Channel 241C, Raleigh; WRAL(FM), Channel 268C, Raleigh; WWMY(FM), Channel 275A, Raleigh; WRTG(AM), 1000 kHz, Garner; and WAUG(AM), 750 kHz, New Hope.

applicant's proposed use of the spectrum, has the potential to produce anomalous results that would seem to contravene the original statutory mandate of Section 307(b)²

That "anomalous result" contravening Section 307(b) would be produced here were WHLQ permitted to move to Rolesville, serve the vast majority of the greater Raleigh market, and abandon Louisburg's only FM service.

While WHLQ's counterproposal does not trigger *WHLQ*'s obligation to perform a *Tuck* analysis,³ NAC is still entitled to demonstrate that Rolesville is "sufficient[ly] dependent" upon Raleigh to support the public interest finding that Rolesville's "local transmission needs can be adequately served by stations licensed to other communities within the larger metropolitan area."⁴ A *Tuck* analysis involves weighing the relative equities of three principal factors: (a) the signal population coverage; (b) the size and proximity of the specified community to the central city; and (c) the interdependence of the specified community to the central city of the "urbanized area." The third factor, the interdependence of the specified community to the central city, is the "critical consideration."⁵ As the Commission has stated:

In assessing the interdependence of the specified community with the central city, we will consider the following characteristics: (1) the extent to which community residents work in the larger metropolitan area, rather than the specified community; (2) whether the smaller community has its own newspaper or other media that covers the community's local needs and interests; (3) whether community leaders and residents perceive the specified community as being an integral part of, or separate from, the larger metropolitan area; (4)

² *Tuck* at ¶ 4.

³ See *Headland, Alabama, and Chattahoochee, Florida*, 10 FCC Rcd 10352 (1995), at ¶ 11.

⁴ *Tuck* at ¶ 49.

⁵ *Tuck* at ¶ 34.

whether the specified community has its own local government and elected officials; (5) whether the smaller community has its own telephone book provided by the local telephone company or zip code; (6) whether the smaller community has its own commercial establishments, health facilities, and transportation systems; (7) the extent to which the specified community and the central city are part of the same advertising markets; and (8) the extent to which the specified community relies on the larger metropolitan area for various municipal services such as police, fire protection, schools, and libraries.⁶

Under these criteria, WHLQ's counterproposal does not warrant an allotment preference.

In the discussion below, the three principal *Tuck* factors are taken in reverse order, beginning with the interdependency issue, which is by far the most important.

A. Rolesville Is Interdependent With Raleigh

The eight interdependency factors plainly point to Rolesville's interdependence with Raleigh.

1. Work Patterns

According to the U.S. Census Bureau, among its population, Rolesville had 303 workers aged 16 and over in 1990.⁷ Of these 303 workers, only 20 worked in Rolesville itself while 283 worked outside of Rolesville.⁸ In other words, more than 93% of workers living in Rolesville

⁶ *Tuck* at ¶ 36.

⁷ Complete results of the 2000 Census have not been released, including all pertinent data on place of work. Therefore, NAC relies on the 1990 Census to show work patterns for Rolesville. In 1990, the total population of Rolesville was 577. *See* P001. Persons—Universe: Persons; Data Set: 1990 Summary Tape File 3 (STF 3)—Sample Data [Rolesville town, North Carolina] [attached hereto as Exhibit 1]. According to the 2000 Census, the population of Rolesville is now 907. *See* P1. Total Population [1]—Universe: Total population; Data Set: Census 2000 Summary File 1 (SF 1) 100-Percent Data [Rolesville town, North Carolina] [attached hereto as Exhibit 2].

⁸ *See* P046. Place of Work—Place Level—Universe: Workers 16 years and over; Data Set: 1990 Summary Tape File 3 (STF 3)—Sample Data [Rolesville town, North Carolina] [attached hereto as Exhibit 3].

commuted to work outside of Rolesville. In addition, of all 303 workers, 241, or 80%, commuted 15 minutes or more to work.⁹ Clearly, then, the vast majority of Rolesville's residents work in the greater Raleigh metropolitan area, rather than in Rolesville itself.¹⁰

2. *Local Media*

Rolesville does not have its own daily or weekly newspaper.¹¹ To the best of NAC's knowledge, Rolesville is not even served by a local community shopper dedicated specifically to Rolesville.¹² Instead, Rolesville and the greater Raleigh area are served by the Raleigh *News & Observer* (daily circulation 161,175; Sunday circulation 207,437). Local Rolesville events and news of direct pertinence to the community, as well as news of the greater Raleigh area, are covered by the *News & Observer*. Local home delivery of the *News & Observer* is readily available in Rolesville.¹³ Indeed, between home delivery and single copy sales,¹⁴ the *News & Observer* has

⁹ See P050. Travel Time to Work—Universe: Workers 16 years and over; Data Set: 1990 Summary Tape File 3 (STF 3)—Sample Data [Rolesville town, North Carolina] [attached hereto as Exhibit 4].

¹⁰ See *RKO General Inc. (KFRC)*, 5 FCC Rcd 3222 (1990) (“*KFRC*”), at ¶ 19 (finding that where only 35.1% of residents work in specified community, factor points to interdependence).

¹¹ See 2001 EDITOR&PUBLISHER INTERNATIONAL YEAR BOOK, Part 1: Dailies at I-307 to I-322 (no listing for Rolesville in North Carolina section) and Part 2: Weeklies at Comm-242 to Comm-250 (no listing for Rolesville in North Carolina section).

¹² Rolesville is apparently served by the weekly *Southside Shopper*, published in Garner, which serves all of Wake County. A field study of Rolesville revealed only one newsrack for the *Southside Shopper*, which was located outside the CVS Pharmacy in the Redford Place shopping center in Rolesville.

¹³ In fact, Rolesville's Town Hall, like many homes in Rolesville, has a *News & Observer* mailbox in front for local delivery of the newspaper.

¹⁴ A field study of Rolesville found seven newsracks selling the *News & Observer*. By contrast, there was one newsrack selling *The Wake Weekly*, published in Wake Forest, and one
(continued...)

tremendous penetration in Rolesville:

Circulation of the Raleigh News & Observer in Rolesville¹⁵

	Home Delivery	Single Copy Sales	Total Sales	Total Penetration
M-F	192	204	396	48%
Saturday	203	244	447	54%
Sunday	220	383	603	73%

Rolesville apparently cannot support and otherwise does not need its own newspaper or other media to cover local needs and interests.¹⁶

Rolesville is within the protected service contours of 10 local radio stations (4 AM and 6 FM) licensed to communities in the Raleigh Urbanized Area: WDTF(AM), 570 kHz, Raleigh; WPTF(AM), 680 kHz, Raleigh; WRBZ(AM), 850 kHz, Raleigh; WKNC-FM, Channel 201A, Raleigh¹⁷; WSHA(FM), Channel 205C3, Raleigh; WCPE(FM), Channel 209C, Raleigh; WQDR(FM), Channel 234C, Raleigh; WBBB(FM), Channel 241C, Raleigh; WRAL(FM),

¹⁴(...continued)

newsrack selling *The Franklin Times*, published in Louisburg, which is located in neighboring Franklin County. Both of these latter racks were located outside the Food Lion grocery store in the Redford Place shopping center in Rolesville.

¹⁵ Audited figures for year ending December 2000 pursuant to telephone conversation with LeeAnn Lane, Market Research Department, *News & Observer*, May 1, 2002.

¹⁶ See *KFRC* at ¶ 17 (finding it significant that specified community does not have its own daily newspaper and that central city newspaper has wide distribution throughout greater metropolitan area).

¹⁷ The protected service contour of WKNC-FM, as licensed, currently bisects the Town of Rolesville. However, under the facilities that WKNC-FM will construct pursuant to its issued construction permit, all of Rolesville will be located within WKNC-FM's protected service area.

Channel 268C, Raleigh; and WAUG(AM), 750 kHz, New Hope.¹⁸ By any measure, Rolesville is well-served with aural services, aural services that should be deemed local because of Rolesville's interdependence with Raleigh. Certainly there is no reason to think that these 10 radio stations licensed to communities in the Raleigh Urbanized Area would support a finding or inference that Rolesville is independent.

3. *Perceptions*

Actions can often speak louder than words. In its counterproposal, WHLQ touts Rolesville's local government and its local chamber of commerce. However, of the Town of Rolesville's four principal employees, there is no evidence that even one of them actually resides in Rolesville.¹⁹ Similarly, of the four officers of the Rolesville Chamber of Commerce, apparently only one resides in Rolesville.²⁰ These community leaders apparently view Rolesville as an integral part of the greater Raleigh area, as evidenced by where they have chosen to live.

4. *Local Government*

Rolesville does have its own local government and elected officials. But, as seen above, it appears that none of the Town of Rolesville's principal employees actually live there.

¹⁸ See Exhibit 5 (attached hereto).

¹⁹ According to the greater Raleigh telephone book and Switchboard.com, Town Manager Don Dubay resides at 12301 Chastain Drive, Raleigh 27614, and Town Attorney Jonathan Koffa resides at 7204 Vixen Court, Raleigh 27616. No residential address for Police Chief James F. Green, Jr. or for Town Clerk Lynn House could be found.

²⁰ Only Jo Anne Horton resides in Rolesville. Faye Nelson and Teresa Mobley reside in Wake Forest. No residential address for Scott Reece could be found.

Moreover, it is worth observing that the Rolesville Chamber of Commerce itself has no physical quarters in Rolesville, only a post office box.

5. *Telephone Book*

The greater Raleigh area is served by two principal incumbent local exchange carriers, BellSouth and Sprint. Rolesville is served by Sprint in the Wake Forest basic service area exchange. Rolesville neither has its own telephone book nor even a separate listing within the Wake Forest telephone book published by Sprint or the greater Raleigh telephone book published by BellSouth.²¹ Instead, Rolesville telephone numbers are simply interspersed in the listings for Wake Forest [see Exhibit 6 (Sprint white pages); Exhibit 7 (BellSouth white pages)]. In fact, as seen by the first page of the Wake Forest listings in each of the telephone books, Raleigh exchange telephone numbers also appear in the listings, showing the interdependent nature of the communities. Telephone calls to Raleigh from Rolesville and from Raleigh to Rolesville are local calls that do not incur toll charges.²²

6. *Local Infrastructure*

Rolesville does possess some commercial establishments, but many of these are simply outlets or branches of commercial establishments that serve the greater Raleigh area or are national franchises. For example, WHLQ in its counterproposal lists the following such establishments: McDonald's (national fast-food); Central Carolina Bank (regional bank); Food Lion (regional grocery store); CVS Pharmacy (national pharmacy); Exxon (national gas); Amoco (national gas); Ace Hardware (national hardware); Los Tres Magueyes Restaurant (greater Raleigh Mexican restaurant with at least three local branches); Dollar General (regional discount store); Subway

²¹ See *KFRC* at ¶ 17 (finding it significant that specified community does not have its own telephone directory).

While Rolesville does have a zip code, that is for the convenience of the Post Office and is not a probative indicator of Rolesville's independence. The Federal Communications Commission has its own zip code, but that does not make the Commission physically independent of Washington, D.C.

²² See Exhibits 8 and 9 (attached hereto).

(national fast-food); and Krispy Kreme Doughnuts (regional/national doughnut chain).²³

Of more substantial importance, Rolesville does not have its own hospital; instead, Rolesville residents are served by the three Raleigh hospitals (Rex Hospital, Raleigh Community Hospital, and Wake Medical Center).

Similarly, Rolesville does not have its own transportation systems. However, it is worth observing that Rolesville straddles U.S. Highway 401, a major artery leading into and out of Raleigh.

7. *Advertising Markets*

Rolesville is, virtually by definition, part of the greater Raleigh advertising market. In short, there is no such thing as a local Rolesville advertising market. In radio, Rolesville is part of the Arbitron Raleigh-Durham Metro area (Market #46). As shown above, most of the commercial establishments in Rolesville that would advertise on radio are outlets or branches of significantly larger entities. Such entities, such as McDonald's, Hardee's, Subway, Food Lion, CVS, and Central Carolina Bank, would purchase advertising time as part of a regional buy and not to target Rolesville residents in particular. Also, as shown above, Rolesville does not have its own local newspaper or other distinctly local advertising media. It is, therefore, clear beyond dispute that Rolesville is not a distinct and separate advertising market but rather is only a suburban component of the central city, i.e., Raleigh, advertising market.

8. *Municipal Services*

In North Carolina, local school districts are delineated within county boundaries and are

²³ In addition, Rolesville has a Hardee's (national fast-food). Also, although WHLQ states that New Life Church is located on Main Street in Rolesville, *see* WHLQ's Comments at 4, that is incorrect. New Life Church is located just outside the town limits of Rolesville on U.S. Highway 401 North at Pulley Town Road. Its physical address is 800 Louisburg Road, Wake Forest, North Carolina 27587-6882.

either (1) split between city school districts and county school districts or (2) are county-wide unified school districts. In Wake County, the county that is home to both Raleigh and Rolesville, the schools are part of a unified county-wide school district, the Wake County Public School System (“WCPSS”). Rolesville, therefore, does not have its own school system. Rolesville possesses one elementary school out of the 78 in the WCPSS. Rolesville has no middle school (out of 25) and no high school (out of 16); instead, the local middle school and high school are located in nearby Wake Forest. Rolesville has no college, junior college, community college, or technical college.

Rolesville has no public library. Like the schools, the libraries are part of the county-wide Wake County Public Library System. The closest library to Rolesville is located in Wake Forest.

The City of Raleigh provides water and sewer service for Rolesville.

Time Warner Cable, Raleigh Division, provides cable service to Rolesville.

WHLQ claims that “[p]arks and recreation services are provided by a volunteer commission with members from the town and local community. Services include children and adult athletic programs, art programs and park development.”²⁴ However, Rolesville’s website shows only one park, the Rolesville Community School/Park,²⁵ and that park, which consists of two ball fields and a picnic area, is located directly behind the WCPSS’s Rolesville Elementary School and is part of the Wake County park system.²⁶

While it is true that Rolesville has a five-member police force and a volunteer fire department, all of the municipalities in the greater Raleigh area in Wake County possess their own

²⁴ WHLQ’s Comments at 3-4.

²⁵ See Exhibit 10 (attached hereto).

²⁶ See Exhibit 11 (attached hereto).

police and fire departments.²⁷ As the Commission has stated, “the fact that a community provides its own fire protection would not be particularly probative of its independence from the larger metropolitan area if other evidence reflected that it is quite common for such communities to have separate fire departments.”²⁸

* * *

In sum, of the eight characteristics the Commission uses to assess interdependence, seven of them clearly and unequivocally point to Rolesville’s interdependence with Raleigh.²⁹ And as for the eighth, the fact that Rolesville does have its own local government, that fact is hardly probative, let alone dispositive, of Rolesville’s independence since there is no evidence that the principal employees of the Town of Rolesville even live in the community.

B. Rolesville Is Virtually Adjacent To Raleigh And Only 1/300th Raleigh’s Size

According to the 2000 Census, the population of the Town of Rolesville is 907³⁰ and the population of the City of Raleigh is 276,093.³¹ In other words, Raleigh is more than 300 times larger

²⁷ That is, Apex, Cary, Fuquay-Varina, Garner, Holly Springs, Knightdale, Morrisville, Raleigh, Rolesville, Wake Forest, Wendell, and Zebulon—the incorporated municipalities in Wake County—each have their own police and fire departments.

²⁸ *Tuck* at ¶ 38 n.3.

²⁹ *Cf. Eatonton and Sandy Springs, Georgia*, DA 91-1342, 70 Rad. Reg. 2d 182 (1991), at ¶ 26; *KFRC* at ¶¶ 17-20; *Greenfield and Del Rey Oaks, California*, 11 FCC Rcd 12681 (1996), at ¶ 9.

³⁰ *See* Exhibit 2.

³¹ *See* P1. Total Population [1]—Universe: Total population; Data Set: Census 2000 Summary File 1 (SF 1) 100-Percent Data [Raleigh city, North Carolina] [attached hereto as Exhibit 12].

than Rolesville.³² And that calculation really excludes the greater Raleigh area, for the population of Wake County is 627,846,³³ making Rolesville only 1/700th of the population of the greater Raleigh/Wake County area.

According to the office of Geographical Information Services in Wake County, only 9490 feet (1.8 miles) separate the city limits of Raleigh and the town limits of Rolesville. Moreover, only 4613 feet (0.87 mile) separate the extra-territorial jurisdictions of the two municipalities. In both cases, these distances are measured down the U.S. Highway 401 corridor, a major artery connecting Raleigh and Rolesville.

Plainly, then, Rolesville is nearly contiguous with Raleigh now and probably will be in the near future, and Raleigh dwarfs Rolesville in size. NAC is unaware of any case in which the Commission found a specified community so close to and so disparate in size with the central city to be independent and ultimately to merit an allotment preference.³⁴

C. The Proposed Signal Population Coverage Highlights WHLQ's Attempt To Cover Raleigh

WHLQ states that its 70 dBu service will provide service to only 20% of the population of

³² To put it yet another way, Rolesville's population is only 0.33% of Raleigh's population.

³³ See P1. Total Population [1]—Universe: Total population; Data Set: Census 2000 Summary File 1 (SF 1) 100-Percent Data [Wake County, North Carolina] [attached hereto as Exhibit 13].

³⁴ See, e.g., *Bay City et al., Texas*, 8 FCC Rcd 1552 (1993), at ¶ 7 (noting, under the relative size and proximity factor, that the “respective populations of Rollingwood and Austin are 1400 and 345,496 persons[, and proponent] has not demonstrated that a community of 1400 persons four miles from Austin is independent of Austin”; ratio of 1 to 247); *Greenfield and Del Rey Oaks, California* at ¶ 8 (finding relative size factor to weigh against specified community where it had population of 1661 and two central cities had populations of 38,901 and 31,954; ratios of 1 to 23 and 1 to 19, respectively).

the Raleigh Urbanized Area (“UA”) but that its 60 dBu service contour will encompass 445,000 persons.³⁵ This is doubly misleading. First, WHLQ’s calculation of service to the Raleigh UA must rely on the 1990 UA since the 2000 UA had yet to be released, yet the population encompassed by its service contour uses 2000 Census data.

More significantly, the dramatic increase in population that would be served by WHLQ’s reallocation and move—which WHLQ touts as “a **226.9% increase** in population”³⁶—only demonstrates that WHLQ’s real motive is to serve Raleigh, not a small community deserving of its own FM radio station, such as Louisburg, which WHLQ would abandon, or Smithfield, which NAC would serve. Frankly, WHLQ’s counterproposal is nothing but a naked attempt to move closer to a burgeoning metropolis and increase the market value of the station.

In any event, *Tuck*’s signal population coverage factor has generally been applied by the Commission only in cases involving competing technical proposals as set forth in construction permit applications. The large increase in population served is, therefore, not particularly probative in this instance.

* * *

This *Tuck* analysis plainly demonstrates that Rolesville is a mere appendage to Raleigh and the greater Raleigh area. The “critical consideration,” the interdependence of Rolesville with Raleigh, unequivocally weighs in favor of this conclusion, as does the second principal *Tuck* factor, Rolesville’s minuscule size and virtual adjacency to Raleigh. Only the remaining *Tuck* factor, the signal population coverage, ostensibly supports WHLQ’s position, but that factor, while “pertinent,

³⁵ See WHLQ Comments, Engineering Exhibit, at 3.

³⁶ *Id.* (emphasis in original).

... has less significance than evidence of interdependence,”³⁷ and, in any event, really highlights WHLQ’s motive in proposing the reallocation.

As the Commission has stated:

We are concerned with the potential migration of stations from lesser served rural areas to well-served urban areas. To this end, we will not blindly apply a first local service preference of the FM allotment priorities when a station seeks to reallocate its channel to a suburban community in or near an Urbanized Area.³⁸

WHLQ’s counterproposal is the quintessential example of a station proposing to migrate from a lesser served rural area to a well-served urban area. The Commission should not blindly—or otherwise—apply a first local service preference to WHLQ’s counterproposal to move to Rolesville.

II. In A Comparative Analysis, The Public Interest Favors NAC’s Proposal

Since WHLQ is not entitled to a first local service preference, its counterproposal must be comparatively evaluated with NAC’s proposal, since both proposals would then fall under the Commission’s fourth allotment priority.³⁹ In addition, WHLQ’s counterproposal must also be compared with the station’s retention in Louisburg. In both comparisons, WHLQ’s counterproposal falls short, and the public interest clearly favors NAC’s proposal.

NAC proposes to bring first FM transmission service and first nighttime transmission service

³⁷ *Tuck* at ¶ 28.

³⁸ *Anniston and Ashland, Alabama*, 15 FCC Rcd 9971 (2000), at ¶ 7; *see also Detroit Lakes and Barnesville, Minnesota*, 16 FCC Rcd 22581 (2001), at ¶ 4.

³⁹ It is worth noting, as an initial matter, that the gain and loss areas resulting from both proposals, that is in both Goldsboro/Smithfield and Louisburg/Rolesville, are served by a minimum of five full-time aural services.

to Smithfield, population 11,510.⁴⁰ Smithfield is the county seat of Johnston County and contains the county's government offices and county courthouse. Johnston County witnessed tremendous growth over the past decade, growing by 50.0%.⁴¹ Indeed, it was the fastest growing county in North Carolina over the past decade. The Town of Smithfield has its own website, www.smithfield-nc.com, with extensive information on town services and administration, including police, fire, sanitation, public works, and parks and recreation. Smithfield is governed by a mayor and town council. The city provides water services to its residents and part of the electricity, and there are numerous businesses, churches, and residential areas in the community. In addition to a full complement of primary and secondary schools (six overall, part of Johnston County Schools), Smithfield is also home to Johnston Community College. Smithfield is not located in or near any urbanized area as determined by the 1990 Census. Smithfield has its own newspaper, *The Smithfield Herald*, which is published twice a week and which has a paid circulation of 14,885.⁴² One daytime

⁴⁰ See P1. Total Population [1]—Universe: Total population; Data Set: Census 2000 Summary File 1 (SF 1) 100-Percent Data [Smithfield town, North Carolina] [attached hereto as Exhibit 14]. In NAC's Petition, NAC had used the July 1, 2000, population estimate for Smithfield, which was 11,626. The 2000 Census figure of 11,510 is for April 1, 2000. For consistency in these Reply Comments, NAC is here using the 2000 Census figure.

⁴¹ According to the U.S. Census Bureau, the population of Johnston County in 1990 was 81,306 and its population in 2000 was 121,965. See P0001. Persons—Universe: Persons; Data Set: 1990 Summary Tape File 3 (STF 3)—Sample Data [Johnston County, North Carolina] [attached hereto as Exhibit 15]; P1. Total Population [1]—Universe: Total population; Data Set: Census 2000 Summary File 1 (SF 1) 100-Percent Data [Johnston County, North Carolina] [attached hereto as Exhibit 16].

Indeed, Johnston County's growth has continued at a rapid pace. The population of Johnston County was estimated to be 128,248 on July 1, 2001, an increase of another 5.2% over the 15 month period from April 2000 to July 2001. See Time Series of North Carolina Population Estimates by County: April 1, 2000, to July 1, 2001 [attached hereto as Exhibit 17].

⁴² See 2001 EDITOR&PUBLISHER INTERNATIONAL YEAR BOOK, Part 2: Weeklies, at Comm-246.

AM broadcast station is licensed to Smithfield (WMPM (1270 kHz)), but there are no full-time aural services licensed to Smithfield or anywhere else in this rapidly-growing county.⁴³ The protected service contour of a relocated WKIX, operating on Channel 272A at maximum facilities at the reference site proposed for Smithfield (35° 28' 21" N, 78° 19' 43" W) will provide service to 140,802 persons in 2516 square kilometers. As the Commission observed in the *Notice*,

reallotment of Channel 272A to Smithfield would not deprive Goldsboro (population 40,709) of its sole local transmission outlet because Goldsboro would continue to be served by FM Station WYMY, Channel 245C, and full-time AM Station WGBR at 1150 kHz, as well as AM Stations WFMC at 730 kHz and WSSG at 1300 kHz. Although Station WKIX currently provides 100 percent coverage of the Goldsboro Urbanized Area, its 60 dBu contour will provide about 10 percent coverage of that urbanized area from its proposed transmitter site at Smithfield.⁴⁴

Indeed, first full-time local transmission service to Smithfield is preferable to third full-time local transmission service to Goldsboro. It would plainly be in the public interest to allot to Smithfield its first FM local transmission service and first full-time local transmission service.⁴⁵

⁴³ In fact, besides daytime-only WMPM(AM), the only other station licensed in the county is WBZB(AM), 1090 kHz, Selma, but the Commission's CDBS shows that station to be silent.

⁴⁴ *Notice* at ¶ 3.

⁴⁵ See Revision of FM Assignment Policies and Procedures, *Second Report and Order*, 90 FCC 2d 88 (1982), at ¶¶ 6, 12 & 12 n.8 (recognizing that the original 1963 priorities, which included a priority "to provide each community with at least one FM broadcast station, especially where the community has only a daytime-only or local (Class IV) station, and especially where the community is outside of an urbanized area" would continue to influence the public interest determination, as would factors such as the growth rate of communities); see also *Lockport and Amherst, New York*, 14 FCC Rcd 15438 (1999), at ¶ 5 (noting public interest benefit of second local service and first local nighttime service); *St. Maries, Idaho, and Spokane, Washington*, 14 FCC Rcd 17012 (1999), at ¶ 15 (noting public interest favors second local aural service and first local FM service); cf. *Carmel Valley, California*, MM Docket No. 99-171, DA 99-1707 (Allocations Branch released Aug. 27, 1999) (finding that first local FM service to a community where an AM station was already licensed to the community satisfied the Commission's allotment priorities).

By contrast, WHLQ proposes to bring what amounts to 15th aural service to Rolesville, population 907, when considered part of the greater Raleigh area. Smithfield is nearly 13 times larger than Rolesville. Indeed, Rolesville is so small that the Greater Raleigh Convention & Visitors Bureau uses just eight words to describe it: "This small town still boasts just one stoplight."⁴⁶ In terms of both population and aural service, the allotment to Smithfield is greatly preferred as being in the public interest over that to Rolesville.⁴⁷

Similarly, in comparing WHLQ's counterproposal for Rolesville with its current community of license, Louisburg, the equities clearly favor retention of Louisburg's only protected full-time service. Louisburg has a population of 3111 compared with Rolesville's 907.⁴⁸ Louisburg is the county seat of Franklin County; houses the county courthouse; possesses a full complement of primary and secondary schools (six overall, part of Franklin County Schools); and is home to Louisburg College, a two-year liberal arts college. Louisburg has its own newspaper, *The Franklin*

⁴⁶ See Exhibit 18 (attached hereto).

⁴⁷ See *Anniston and Ashland, Alabama* at ¶ 12 (noting that, consistent with prior decisions, service to the larger community is preferred to service over the smaller community when considered at the same priority level; 7 to 1 population ratio); *Detroit Lakes and Barnesville, Minnesota* at ¶ 10 (2 to 1 population ratio); *St. Maries, Idaho, and Spokane, Washington* at ¶ 15 (preferring second local aural service and first local FM service to community of 2442 than expansion of 22nd aural service to city with population of 177,196 with numerous outlets for self-expression); *Lockport and Amherst, New York* at ¶ 5 (preferring second local service and first local nighttime service to only second local service, where population also favored the former); *Obion and Tiptonville, Tennessee*, 7 FCC Rcd 2644 (1992) (preferring Tiptonville with population of 2149 to Obion with population of 1241 even though (1) Obion had one fewer aural services and (2) the Obion allotment would serve 8068 more people).

⁴⁸ See P1. Total Population [1]—Universe: Total population; Data Set: Census 2000 Summary File 1 (SF 1) 100-Percent Data [Louisburg town, North Carolina] [attached hereto as Exhibit 19].

Times, which is published twice a week and which has a paid circulation of 8055.⁴⁹ Were WHLQ's counterproposal granted, then Louisburg, indeed, the whole of Franklin County, would be left with only one radio station, WYRN(AM), which operates at 1480 kHz with very limited, unprotected nighttime service of only 35 watts. It is well-settled that the "public has a legitimate expectation that existing service will continue, and this expectation is a factor we must weigh independently against the service benefits that may result from reallocating of a channel from one community to another."⁵⁰ In this case, the expectation of continued service as the only FM transmission service and the only protected nighttime transmission service, together with the population advantage of Louisburg, make it plain that the public interest favors the retention of WHLQ in Louisburg, particularly since the alternative is to provide 15th aural service to the greater Raleigh area.⁵¹

Conclusion

For the foregoing reasons, WHLQ's counterproposal should not be accorded an allotment preference for allegedly providing first local transmission service to Rolesville. Instead, the Commission should engage in a comparative analysis of NAC's Petition and WHLQ's counterproposal and determine that the public interest is better served by NAC's proposal to bring

⁴⁹ See 2001 EDITOR&PUBLISHER INTERNATIONAL YEAR BOOK, Part 2: Weeklies, at Comm-247.

⁵⁰ *Fairfield and Norwood, Ohio*, 7 FCC Rcd 2377 (1992), at ¶ 12.

⁵¹ See *Fairfield and Norwood, Ohio* at ¶¶ 12-13 (rejecting proposal to remove community's second local transmission service and only local nighttime service in order to provide 18th service to central city); see also *Bay Springs and Ellisville, Mississippi*, Notice of Proposed Rule Making, 14 FCC Rcd 3946 (1999), at ¶ 10 (observing that Commission, while it has "permitted stations to change their communities of license and leave a daytime-only AM station in their former community," has generally only allowed this "where the proposed arrangement of allotments triggered priority (3)" (citing *Chattahoochee, Florida*, 10 FCC Rcd 10352, 10355 (1995)).

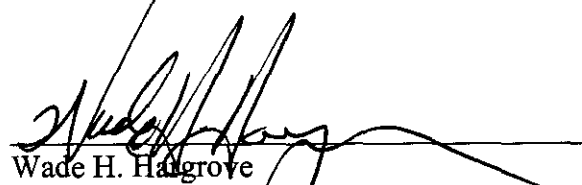
second local transmission service and first full-time FM service to Smithfield than it is by WHLQ's counterproposal to bring the 15th aural service to the greater Raleigh area and deprive Louisburg of its only FM station.

Therefore, NAC respectfully requests that the Commission grant its Petition and amend the Table of FM Allotments as follows:

	<u>North Carolina</u>	
	<i>Present</i>	<i>Proposed</i>
Goldsboro	245C, 272A	245C
Smithfield	-----	272A

NAC also respectfully requests that the Commission modify WKIX's license accordingly.

Respectfully submitted,



Wade H. Hargrove



David Kushner

BROOKS, PIERCE, McLENDON,
HUMPHREY & LEONARD, L.L.P.
First Union Capitol Center, Suite 1600
150 Fayetteville Street Mall (27601)
Post Office Box 1800
Raleigh, North Carolina 27602
Telephone: (919) 839-0300
Facsimile: (919) 839-0304

Counsel to New Age Communications, Inc.

May 10, 2002

Exhibits

P001. Persons—Universe: Persons; Data Set: 1990 Summary Tape File 3 (STF 3)—Sample Data [Rolesville town, North Carolina]	1
P1. Total Population [1]—Universe: Total population; Data Set: Census 2000 Summary File 1 (SF 1) 100-Percent Data [Rolesville town, North Carolina]	2
P046. Place of Work—Place Level—Universe: Workers 16 years and over; Data Set: 1990 Summary Tape File 3 (STF 3)—Sample Data [Rolesville town, North Carolina]	3
P050. Travel Time to Work—Universe: Workers 16 years and over; Data Set: 1990 Summary Tape File 3 (STF 3)—Sample Data [Rolesville town, North Carolina]	4
Raleigh Urbanized Area Radio Stations Providing Coverage to Rolesville	5
Sprint White Pages, Wake Forest Directory, Wake Forest Listings (March 2001)	6
BellSouth White Pages, Greater Raleigh Directory, Wake Forest Listings (March 2002)	7
Sprint White Pages, Henderson/Louisburg/Oxford/Wake Forest Directory at 18 (Extended Area Service) (March 2001)	8
BellSouth White Pages, Greater Raleigh Directory at 8 (Local Calling) (March 2002)	9
Rolesville Parks & Recreation Webpage	10
Wake County School/Park System	11
P1. Total Population [1]—Universe: Total population; Data Set: Census 2000 Summary File 1 (SF 1) 100-Percent Data [Raleigh city, North Carolina]	12
P1. Total Population [1]—Universe: Total population; Data Set: Census 2000 Summary File 1 (SF 1) 100-Percent Data [Wake County, North Carolina]	13

P1. Total Population [1]—Universe: Total population; Data Set: Census 2000 Summary File 1 (SF 1) 100-Percent Data [Smithfield town, North Carolina]	14
P0001. Persons—Universe: Persons; Data Set: 1990 Summary Tape File 3 (STF 3)—Sample Data [Johnston County, North Carolina]	15
P1. Total Population [1]—Universe: Total population; Data Set: Census 2000 Summary File 1 (SF 1) 100-Percent Data [Johnston County, North Carolina]	16
Time Series of North Carolina Population Estimates by County: April 1, 2000, to July 1, 2001	17
Greater Raleigh Convention & Visitors Bureau, <i>Greater Raleigh History & Fun Facts</i>	18
P1. Total Population [1]—Universe: Total population; Data Set: Census 2000 Summary File 1 (SF 1) 100-Percent Data [Louisburg town, North Carolina]	19